

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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ATTORNEYS FOR DEBTOR

In re:

LTL MANAGEMENT LLC,¹

Debtor.

Chapter 11

Case No.: 21-30589 (MBK)

Judge: Michael B. Kaplan

APPLICATION FOR ORDER SHORTENING TIME

TO: THE HONORABLE MICHAEL B. KAPLAN
CHIEF UNITED STATES BANKRUPTCY JUDGE

The above-captioned debtor (the “Debtor”), by and through its undersigned counsel,
requests that the time period to notice a hearing on the *Debtor’s Motion For Entry of an Order
Waiving the Requirement of Rule 3003-1(a)(2) of the Local Rules of the United States*

¹ The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

Bankruptcy Court District of New Jersey (the “Motion”)² as required by Fed. R. Bankr.

P. 1007(c) and D.N.J. LBR 9013-2(a) be shortened pursuant to Fed. R. Bankr. P 9006(c)(1), for the reasons set forth below:

1. A shortened hearing time is requested because: The Debtor anticipates that it will shortly be engaging in settlement discussions with certain states that are conducting investigations or have commenced lawsuits related to the talc products of the Debtor’s predecessor and Johnson & Johnson. As detailed in the Motion, the Debtor recently confirmed that various states (collectively, the “Mediating States”) have agreed to stay their proceedings and engage in mediation efforts with the Debtor to resolve potential claims. Counsel to the ad hoc committee of the Mediating States has requested that the Debtor seek the relief requested in the Motion, and the Debtor has agreed. Absent a waiver of Local Bankruptcy Rule 3003-1(a)(2), governmental units “must” file a proof of claim or interest no “later than 180 days after the date of the order for relief.” As a result, the deadline for such parties to file a proof of claim in the Chapter 11 Case would be April 12, 2022. The relief requested by the Motion, if granted, will permit the Debtor to engage in settlement discussions with the ad hoc committee of the Mediating States (and representatives of talc claimants) without the Mediating States and other governmental authorities having to file proofs of claim before such discussions conclude, while permitting the Debtor at a later date to seek the establishment of one or more bar dates tailored for this Chapter 11 Case.

2. State the hearing dates requested: The Debtor respectfully requests that the Court hear the Motion on April 12, 2022, or at a prior date and time which is most convenient for the Court.

² Capitalized terms not otherwise defined herein have the meanings given to them in the Motion.

3. Bridge Order: The Debtor respectfully requests that the Court enter the enclosed proposed *Bridge Order Waiving the Requirement of Rule 3003-1(a)(2) of the Local Rules of the United States Bankruptcy Court District of New Jersey* to ensure that the deadline for governmental units to file proofs of claim under the Local Bankruptcy Rules does not lapse prior to entry of an order on the relief requested in the Motion.

4. Reduction of the time period is not prohibited under Fed. R. Bankr. P 9006(c)(1). The applicant requests entry of the proposed order shortening time.

Dated: April 5, 2022

WOLLMUTH MAHER & DEUTSCH LLP

/s/ Paul R. DeFilippo

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